

## EXHIBIT 2

Declaration of Lindsay D. Robbins, Esq.

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11 Attorneys for Plaintiff, DLJ Mortgage Capital, Inc.

12  
13 **UNITED STATES DISTRICT COURT**  
14 **DISTRICT OF NEVADA**  
15

16 DLJ MORTGAGE CAPITAL, INC.,

17 Plaintiff,

18 vs.

19 OLD REPUBLIC TITLE INSURANCE  
20 GROUP, INC.; OLD REPUBLIC NATIONAL  
21 TITLE INSURANCE COMPANY; TITLEONE  
22 OF LAS VEGAS, INC.; DOE INDIVIDUALS I  
23 through X; and ROE CORPORATIONS XI  
24 through XX, inclusive,

25 Defendants.  
26

Case No.: 2:20-cv-01662-KJD-VCF

**DECLARATION OF LINDSAY D.  
ROBBINS, ESQ. IN SUPPORT OF  
PLAINTIFF'S MOTION FOR LEAVE  
TO SERVE DEFENDANT TITLEONE  
OF LAS VEGAS, INC. VIA THE  
NEVADA SECRETARY OF STATE**

27 I, Lindsay D. Robbins, Esq., do hereby declare under penalty of perjury of the laws of the State  
28 of Nevada as follows:

1. I am an attorney duly licensed to practice law in the State of Nevada and an attorney with  
the law firm Wright Finlay & Zak, LLP, counsel for Plaintiff, DLJ Mortgage Capital, Inc. ("Plaintiff")  
in this matter. I make this Declaration in support of Plaintiff's Motion for Leave to Serve Defendant  
TitleOne of Las Vegas, Inc. ("TitleOne") via the Nevada Secretary of State.

2. This Declaration is made in compliance with NRCP 4.2(c)(3)(A).

3. On September 9, 2020, Plaintiff attempted to serve the last known registered agent of  
TitleOne—Clayton Freeman—at 2485 Village Drive, Suite 190, in Henderson Nevada.

4. A true and correct copy of the printout for the Nevada Secretary of State, containing the  
above-address for the registered agent of TitleOne, is attached to the Motion for Leave as Exhibit 1.

1           5.       Plaintiff was unable to effectuate service of process on the registered agent.

2           6.       The Affidavit of Due Diligence states that the address provided for the registered agent is  
3 a “bad address” and that a company called Appreciation Financial has been at the location for one year.  
4 ECF No. 9.

5           7.       Exhibit 1 also contains the names of five officers and directors for TitleOne, all of which  
6 are purportedly located at 1101 West River Street, Suite 201, Boise, Idaho 83702.

7           8.       Due to the unsuccessful attempt to serve TitleOne’s registered agent, on January 4, 2021,  
8 Plaintiff moved to extend the time period to serve TitleOne’s out-of-state officers and directors. ECF  
9 No. 27. The Motion was granted by the Court on January 25, 2021. ECF No. 29.

10          9.       Plaintiff was unable to effectuate service of process on the out-of-state directors and  
11 officers.

12          10.      The Affidavit of Due Diligence states that service on TitleOne could not be effectuated at  
13 the address identified for the out-of-state officers and directors because the address was for “TitleOne  
14 Corporation”, which is a different entity than the named Defendant. ECF No. 30.

15          11.      Plaintiff has attempted, in good faith, to serve TitleOne on multiple occasions.

16          12.      The Nevada Secretary of State’s online search portal for TitleOne does not contain any  
17 additional addresses to serve.

18          13.      Good cause exists to serve TitleOne with the Nevada Secretary of State and leave is  
19 warranted to effectuate service of process.

20               I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true  
21 and correct to the best of my knowledge and belief.

22               DATED this 16<sup>th</sup> day of March, 2021.

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24                               /s/ Lindsay D. Robbins  
25                               Lindsay D. Robbins, Esq.  
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